

UNITED STATES DISTRICT COURT  
FOR DISTRICT OF MASSACHUSETTS

The Louis D. Brandeis Center for Human Rights  
Under Law and Jewish Americans for Fairness in  
Education,

Plaintiffs,

v.

President and Fellows of Harvard College,

Defendant.

Case No. 1:24-cv-11354-RGS

**PLAINTIFFS' MOTION FOR LEAVE TO SUBMIT REQUEST FOR JUDICIAL  
NOTICE IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION  
TO DISMISS THE COMPLAINT**

Pursuant to Local Rule 7.1(b)(3), Plaintiffs The Louis D. Brandeis Center for Human Rights Under Law and Jewish Americans for Fairness in Education respectfully seek leave of this Court to submit the attached Request for Judicial Notice in support of Plaintiffs' opposition to Defendant President and Fellows of Harvard College's motion to dismiss the Complaint.

Plaintiffs recently discovered new information related to the prosecutions of the alleged perpetrators of the assault referenced in the Complaint (*see* Compl. ¶¶ 117-25, 157, 159), and concerning the police investigation referenced by Harvard in its briefs in support of its motion to dismiss, *see, e.g.*, ECF No. 48 at 3-4, 16-17; ECF No. 58 at 2-4.

On October 8, 2024, Plaintiffs provided this motion to Harvard and sought their consent to the motion. On October 10, Harvard informed Plaintiffs that it will oppose this motion.

October 11, 2024  
Boston, Massachusetts

Respectfully Submitted,

/s/ Jonathan D. Polkes

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Kenneth L. Marcus (admitted *pro hac vice*)  
L. Rachel Lerman (admitted *pro hac vice*)  
**THE LOUIS D. BRANDEIS CENTER  
FOR HUMAN RIGHTS UNDER LAW**  
1717 Pennsylvania Avenue NW, Suite 1025  
Washington, DC 20006  
Tel: (202) 559-9296  
klmarcus@brandeiscenter.com  
rlerman@brandeiscenter.com

Jason Torchinsky (admitted *pro hac vice*)  
Jonathan Lienhard (admitted *pro hac vice*)  
John Cycon (admitted *pro hac vice*)  
Erielle Davidson (admitted *pro hac vice*)  
**HOLTZMAN VOGEL BARAN  
TORCHINSKY & JOSEFIK PLLC**  
2300 N Street NW, Suite 643A  
Washington, DC 20037  
Tel: (202) 737-8808  
jtorchinsky@holtzmanvogel.com  
jlienhard@holtzmanvogel.com  
jcycon@holtzmanvogel.com  
edavidson@holtzmanvogel.com

Mohammad O. Jazil (admitted *pro hac vice*)  
**HOLTZMAN VOGEL BARAN  
TORCHINSKY & JOSEFIK PLLC**  
119 S. Monroe Street, Ste 500  
Tallahassee, Florida 32301  
Tel: (850) 270-5938  
mjazil@holtzmanvogel.com

Jonathan Vogel (admitted *pro hac vice*)  
**VOGEL LAW FIRM PLLC**  
6000 Fairview Road  
South Park Towers, Suite 1200  
Charlotte, North Carolina 28210  
Tel: (704) 552-3750  
jonathan.vogel@vogelpllc.com

Jonathan D. Polkes (admitted *pro hac vice*)  
Jared R. Friedmann (admitted *pro hac vice*)  
Rebecca Sivitz (BBO # 684347)  
Shai Berman (*pro hac vice* forthcoming)  
Milana Bretgoltz (*pro hac vice* forthcoming)  
Daniel M. Lifton (*pro hac vice* forthcoming)  
**WEIL, GOTSHAL & MANGES LLP**  
767 Fifth Avenue  
New York, New York 10153  
Tel: (212) 310-8000  
Jonathan.Polkes@weil.com  
Jared.Friedmann@weil.com  
Rebecca.Sivitz@weil.com  
Shai.Berman@weil.com  
Milana.Bretgoltz@weil.com  
Daniel.Lifton@weil.com

Alli G. Katzen (*pro hac vice* forthcoming)  
**WEIL GOTSHAL & MANGES LLP**  
1395 Brickell Avenue, Ste #1200  
Miami, FL 33131  
Tel: 305-577-3163  
Alli.Katzen@weil.com

Douglas Brooks (BBO #636697)  
**LIBBY HOOPES BROOKS & MULVEY  
P.C.**  
260 Franklin Street, Suite 1920  
Boston, Massachusetts 02110  
Tel: (617) 338-9300  
dbrooks@lhbmllegal.com

**Certificate of Service**

I hereby certify that on October 11, 2024, I caused this document to be filed through the CM/ECF system, with a notice and copy of this filing sent electronically to the registered participants as identified on the Notice of Electronic Filing, as well as by e-mail to all parties.

/s/ Jonathan D. Polkes  
Jonathan D. Polkes (*pro hac vice*)